

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Virginia**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Criminal No. 1:18 CR 83

The Honorable T.S. Ellis, III

**STIPULATION REGARDING PURCHASE OF THE PROPERTY LOCATED
AT 377 UNION STREET, BROOKLYN, NEW YORK ("377 UNION STREET")**

The parties stipulate to the following facts:

1. First Nationwide Title Agency settled the purchase of 377 Union Street on December 28, 2012.
2. On November 14, 2012, MC Brooklyn Holdings, LLC entered into a residential contract of sale for the purchase of real property at 377 Union Street, Brooklyn, New York. The purchase price was \$2,995,000. The down payment was \$299,500.
3. As payment for the down payment of \$299,500, on November 20, 2012, a wire transfer from Lucicle Consultants Limited in the amount of \$299,500 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to the attorney trust account of Michele Scotto, Esq., in her capacity as the attorney for the seller.

4. On December 27, 2012, Jessica Manafort as a member of MC Brooklyn Holdings, LLC, designated Bruce Baldinger, Esq., as an agent of MC Brooklyn Holdings, LLC.
5. As payment for the remainder due for the purchase of 377 Union Street, on December 27, 2012, Bruce Baldinger, on behalf of MC Brooklyn Holdings, LLC, transferred \$2,800,000 from his law firm's bank account at TD Bank to First Nationwide Title Agency, LLC. On December 28, 2012, First Nationwide Title Agency, LLC conducted the settlement, that is the sale, of MC Brooklyn Holdings, LLC's purchase of the 377 Union Street.
6. The records attached to this stipulation as Exhibits A through B are records of First Nationwide Title Agency and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.
 - a. Exhibit A is a copy of the residential contract of sale for 377 Union Street dated November 14, 2012.
 - b. Exhibit B is a copy of the real property transfer of 377 Union Street dated December 28, 2012.

We ask for this:

Paul J. Manafort, Jr.,
Defendant

ROBERT S. MUELLER, III
Special Counsel

By:



Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

By:



Andrew Weissmann
Greg D. Andres
Brandon L. Van Grack
Special Assistant United States Attorneys
Uzo Asonye
Assistant United States Attorney